

1 **APPL**

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10 Attorneys for Plaintiff

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 DEANNA STAHL,

14 CASE NO. 2:15-CV-01681-RFB-GWF

15 Plaintiff,

16 vs.

17 TARGET CORPORATION; DOE
18 INDIVIDUALS 1 through 10; ROE
19 CORPORATIONS 11 through 20;
20 and ABC LIMITED LIABILITY
21 COMPANIES 21 through 30;

22 Defendants.

23 **UNOPPOSED MOTION TO EXTEND TIME TO FILE OPPOSITION TO**
24 **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

25 (First Request)

26 Plaintiff Deanna Stahl ("Ms. Stahl") by and through her attorney William R. Killip, Jr.,
27 Esq., of the Nettles Law Firm, hereby moves this Court, pursuant to LR IA 6-1 and LR IA 6-1 of
28 the U.S. District Court, District of Nevada Local Rules of Practice, for an extension of time to file
Plaintiff's Opposition to Defendant's Motion for Summary Judgment. Defendant's Motion for
Summary Judgment was filed on September 23, 2016. This motion is made and based on all the
pleadings and papers on file herein and the following Points and Authorities.

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AFFIDAVIT OF WILLIAM R. KILLIP, JR, ESQ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

1. I am the attorney for Deanna Stahl, the plaintiff herein. I have personal knowledge of the facts set forth in this affidavit. If called upon to do so, I could competently testify as to the matter stated herein.

2. On October 17, 2016, my office spoke with Defendant's counsel Douglas M. Rowan, Esq. regarding an extension of time to file Plaintiff's Opposition to Defendant's Motion for Summary Judgment.

3. The parties agreed upon an extension to October 19, 2016 for the filing of Plaintiff's Opposition.

4. Due to the lateness of the hour, Plaintiff files an unopposed Motion to extend the time to file Plaintiff's Opposition to October 19, 2016.

5. I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

WILLIAM R. KILLIP, JR., ESO.

SUBSCRIBED AND SWORN to before
me this 17 day of October, 2016.

NOTARY PUBLIC



POINTS & AUTHORITIES

I.

FACTS

This arises from a personal injury incident while Plaintiff was shopping at the Target store located at 4100 Blue Diamond Road in Las Vegas, Nevada (“the Premises”). On August 30, 2013, Plaintiff was purchasing some plastic containers at the cash register when she noticed the items she intended to purchase were broken. Due to the length of time Defendant’s employees were taking to bring new containers to the register, Plaintiff informed the cashier she would go get new containers to purchase herself. While Plaintiff was walking towards the isle where the containers were located, she slipped and fell on a puddle of clear liquid located on the floor in the area of the greeting cards. Plaintiff sustained serious injuries as a result.

On September 23, 2016, Defendant filed its Motion for Summary Judgment on the grounds that there is insufficient evidence upon which Plaintiff can establish a cause of action of negligence against Target as a matter of law. Plaintiff's Opposition to Defendant's Motion for Summary Judgment is due on October 17, 2016.

III.

ANALYSIS

Plaintiff's seeks a two day extension of time to file her Opposition to Defendant's Motion for Summary Judgment. On October 17, 2016, Plaintiff's counsel's office spoke with defense counsel Douglas M. Rowan, Esq. by telephone regarding an extension to file Plaintiff's Opposition. The parties were in agreement to extend Plaintiff's filing date to October 19, 2016. Due to the lateness of the hour, Plaintiff files this unopposed motion for an extension to file Plaintiff's Opposition to Defendant's Motion for Summary Judgment by October 19, 2016. See Affidavit of William R. Killip, Jr., Esq., attached hereto.

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1 III.
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3 **CONCLUSION**
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5 Plaintiff respectfully request that this Honorable Court grant an extension of time to file
6 Plaintiff's Opposition to Defendant's Motion for Summary Judgment.
7

8 DATED this 17 day of October, 2016.
9

10 NETTLES LAW FIRM
11

12 By: 
13 WILLIAM R. KILLIP, JR., ESQ.
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21

22 IT IS SO ORDERED:
23

24 
25 UNITED STATES MAGISTRATE JUDGE
26

27 DATED: October 18, 2016
28

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th of October, 2016, that I served true and correct copies of the above and foregoing ***Unopposed Motion to Extend Time to File Plaintiff's Opposition to Defendant's Motion for Summary Judgment*** on all interested parties, addressed as follows:

Facsimile: (702) 727-1401

Kym Samuel Cushing, Esq.

Douglas M. Roman, Esq.

WILSON, ELSER, MOSKOWITZ,

EDELMAN DICKER LLP

300 S. Fourth St. 11 fl.

500 S. Fourth St., P.O. Box
Las Vegas, Nevada 89101

Las Vegas, Nevada 89119
Attorney for Defendant

Attorney for Defendant

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NETTLES LAW FIRM



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